



Consumer Protection Section
Annual Report
2003

10/01/2002 through 09/30/2003

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LABORATORY DIVISION CONSUMER PROTECTION SECTION

Michigan Department of Agriculture Key Priorities and Programs

- g Food Safety and Security
- g Environmental Stewardship
- g Animal, Plant Health and Protection
- g Viable Agriculture Development
- g Consumer Protection
- g Homeland Security

Consumer Protection Section Mission Statement

- g Prevent economic fraud and deception concerning weights and measures, motor fuels quality, labeling and advertising of all commodities.
- g Be responsible for environmental issues as they relate to the distribution of gasoline products.
- g Provide National Institute of Standards and Technology (NIST) traceability on the state's standards and measures.
- g Provide regulatory resource expertise to the public, industry, and government.

Michigan Department of Agriculture
Dan Wyant, Director
Keith Creagh, Deputy Director

Laboratory Division
Steve Reh, Division Director
Michael Pinagel, Section Director

Foreword

Weights and measures activities touch every consumer, industry and visitor in the U.S., impacting commerce by more than \$4.13 trillion a year. Acknowledging the important work performed by Michigan's weights and measures officials, the governor annually issues a proclamation designating the first week in March as Michigan Weights and Measures Week.

CERTIFICATE OF PROCLAMATION

On behalf of the citizens of Michigan, Governor Jennifer M. Granholm
hereby proclaims the week of March 1, 2003, as

Weights and Measures Week

Whereas, The Weights and Measures Program of the Michigan Department of Agriculture Laboratory Division serves to meet the public need of standard weights and measures in the State of Michigan; and

Whereas, The employees of the Weights and Measures Program are responsible for ensuring that all weighing and measuring devices used in commerce are accurate in both their design and operation; and

Whereas, Weights and measures activities had an estimated economic impact of over \$171.8 billion in Michigan in 2002; and

Whereas, With a theme of, "Weights and Measures: Working for Integrity in the Marketplace", confidence in all transactions based upon weight, measure or count for both consumers and industry is critical for the continued expansion of Michigan's diverse domestic and export economies; and,

Whereas, Each year the first week in March is set aside to commemorate the enactment of our nation's first Weights and Measures Law in 1799 and to increase public awareness of the importance of this law; and now therefore be it

Resolved, That I, Jennifer M. Granholm, Governor of the State of Michigan, do hereby proclaim the week of March 1, 2003, as Weights and Measures Week in Michigan in conjunction with the national celebration of the 204th anniversary of our nation's Weights and Measures Law.

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GENERAL INFORMATION AND STATISTICS

Establishments Licensed

Gasoline Retail Outlets	5,176
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Certificates Issued

Livestock Weighmasters	6
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Service Agencies and Personnel Registered

Servicepersons	186
Service Agencies	84

Formal Complaints Investigated

Weights and Measures	861
Gasoline (Quality)	164
TOTAL	1,025

Motor Fuels Quality Hotline (1-800-MDA-FUEL)

Complaints Received and Responded	1,041
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Note: Complaints outside of the program's responsibility were forwarded to the appropriate agency.

Freedom of Information Act

Requests Received and Processed	13
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ENFORCEMENT ACTIONS

Hearings and Compliance Meetings

	<u>Compliance Meetings</u>	<u>Hearings</u>	<u>License Revocations</u>
Violation of P.A. 44 of 1984, as amended, Michigan Motor Fuels Quality Act	4	0	0
Violation of P.A. 283 of 1964, as amended, Michigan Weights and Measures Act	7	0	NA
TOTAL	11	0	0

By Violation

	<u>Warning Letters</u>	<u>Administrative Actions</u>	<u>Prosecutions</u>
Violation of P.A. 44 of 1984, as amended, Michigan Motor Fuels Quality Act	726 *	75 **	0
Violation of P.A. 283 of 1964, as amended, Michigan Weights and Measures Act	199	26	1
TOTAL	925	101	1

*This number includes 36 warning letters sent for distributor related violations.

**This number includes 32 administrative fines due to delinquent licenses and two administrative fines against distributors.

Fines/Costs for Prosecutions and Administrative Fines*

Violation of P.A. 44 of 1984, as amended, Michigan Motor Fuels Quality Act	\$33,865
Violation of P.A. 283 of 1964, as amended, Michigan Weights and Measures Act	\$123,985
TOTAL	\$157,850

*Administrative fines are authorized under both P.A. 44 of 1984 and P.A. 283 of 1964.

Seizure and Stop Sale Information

<u>Reason</u>	<u>Seizures</u>	<u>Amount(Lbs)</u>	<u>Value(\$)</u>
Short Weight/Measure	29	353,468	303,335
<u>Reason</u>			<u>Stop Sales</u>
Excess Water in Underground Storage Tank			40
Failure to Meet Quality Standards			22
TOTAL			62

SECTION PHOTOGRAPHS

Senior Weights and Measures Inspector Jim Brown conducts a National Type Evaluation Program (NTEP) test on a heavy capacity truck scale. Weights and Measures staff assist in the official testing of new commercial equipment designs and installations for all types of weighing and measuring devices.



Metrologist Terry Gawel calibrates a prover trailer used to test and certify fuel meters. During FY 2003, laboratory staff performed 170 such calibrations for the Weights and Measures Program, industry, and registered service companies.

Motor Fuels Quality Enforcement Specialist Danielle Allison utilizes a hand-held field octane analyzer to audit the octane rating of gasoline at one of over 5,100 licensed retail gasoline outlets. During FY 2003, Motor Fuels Quality Program staff performed over 1,800 such audits in an effort to ensure consumers are receiving the advertised octane rating.

Metrologist Terry Gawel maneuvers a 5,000 lb weight onto the laboratory's Mettler KG3000 high capacity mass comparator. During FY 2003, laboratory staff tested and calibrated over 9,700 mass standards ranging in size from 1 μ lb - 5,000 lb (1 mg - 500 kg).

Motor Fuels Quality Enforcement Specialist Jon Strong performs a gasoline quality test for water contamination in an underground storage tank. A water indicating gel is spread on the measuring stick and probed to the bottom of the tank. If water is present in an amount over the allowable standard, a "Stop Sale" order is issued. During FY 2003, 40 "Stop Sale" orders were issued for excess water in underground storage tanks.

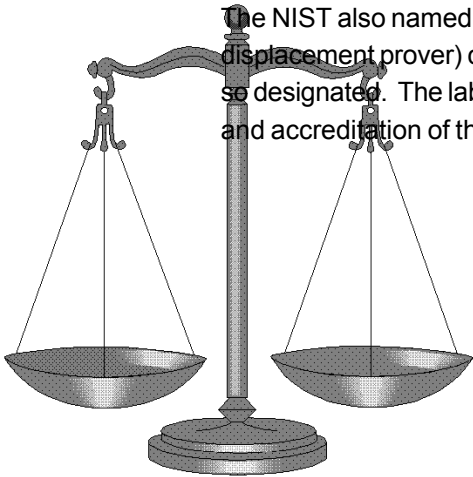
Senior Weights and Measures Inspector Mike Wylie utilizes a "weight cart" to conduct a test on a vehicle scale. The cart allows the inspector to efficiently move up to 35,000 pounds of test weight from one section of the scale to another. During FY 2003, Weights and Measures Program staff conducted inspections on over 900 heavy capacity vehicle scales throughout the state.

METROLOGY LABORATORY

Calibrations at the E.C. Heffron Metrology Laboratory remained constant from the previous fiscal year. In addition to the steady load of calibrations conducted, the laboratory received continued recognition and traceability from the Office of Weights and Measures at the National Institute of Standards and Technology. As part of its program to encourage a high degree of technical and professional competence in such activities, the National Institute of Standards and Technology (NIST) Weights and Measures Division (WMD) has developed performance standards and formalized procedures for recognition of state legal metrology laboratories on a voluntary basis. Certificates of Measurement Traceability are issued upon evaluation of the laboratory's ability to make reliable metrological measurements (principally mass, volume, length, and temperature).

In addition, the laboratory also maintained its National Voluntary Laboratory Accreditation Program (NVLAP) accreditation. NVLAP provides third-party accreditation to testing and calibration laboratories. NVLAP's accreditation programs are established in response to Congressional mandates or administrative actions by the Federal Government or from requests by private-sector organizations. NVLAP is in full conformance with the standards of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), including ISO/IEC 17025 and Guide 58. Michigan's scope of accreditation can be found online at <http://ts.nist.gov/ts/htdocs/210/214/scopes/2004080.pdf>

The NIST also named the E.C. Heffron Metrology Laboratory as a regional small volume prover (compact displacement prover) calibration laboratory. Michigan is one of only three state laboratories that have been so designated. The laboratory will be receiving both technical and monetary support from NIST in the setup and accreditation of these type of calibrations.

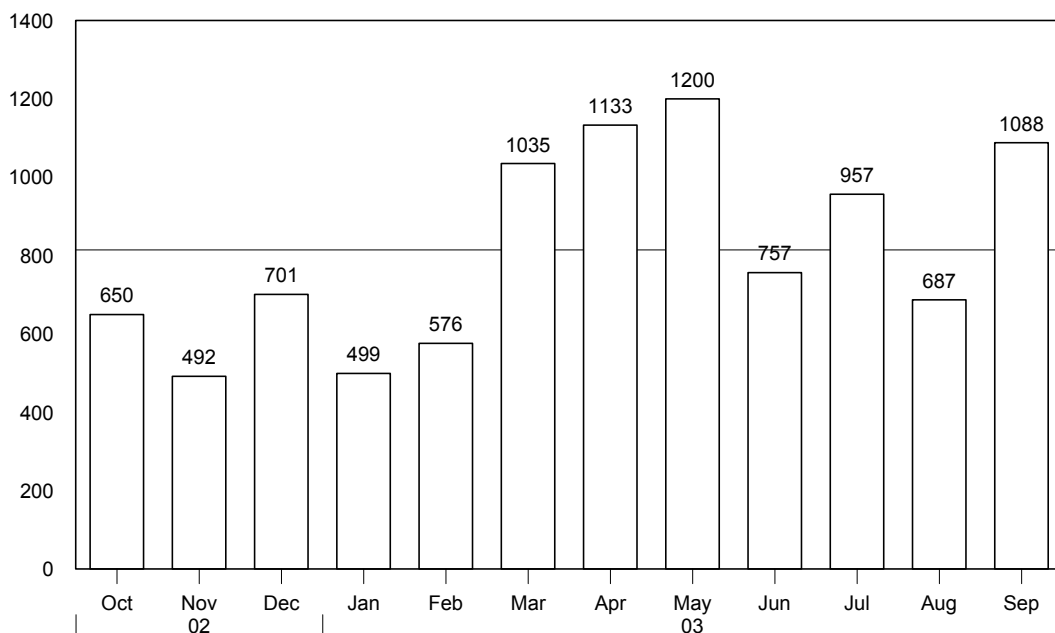


LABORATORY ACTIVITIES

Mass standards are test weights used by industry, service companies, and enforcement programs to determine the accuracy of weighing devices. They vary in size from 6,000 pounds to 1 micropound and from 500 kilograms down to 1 milligram.

* * * * *

Mass Standards Calibrated by Month



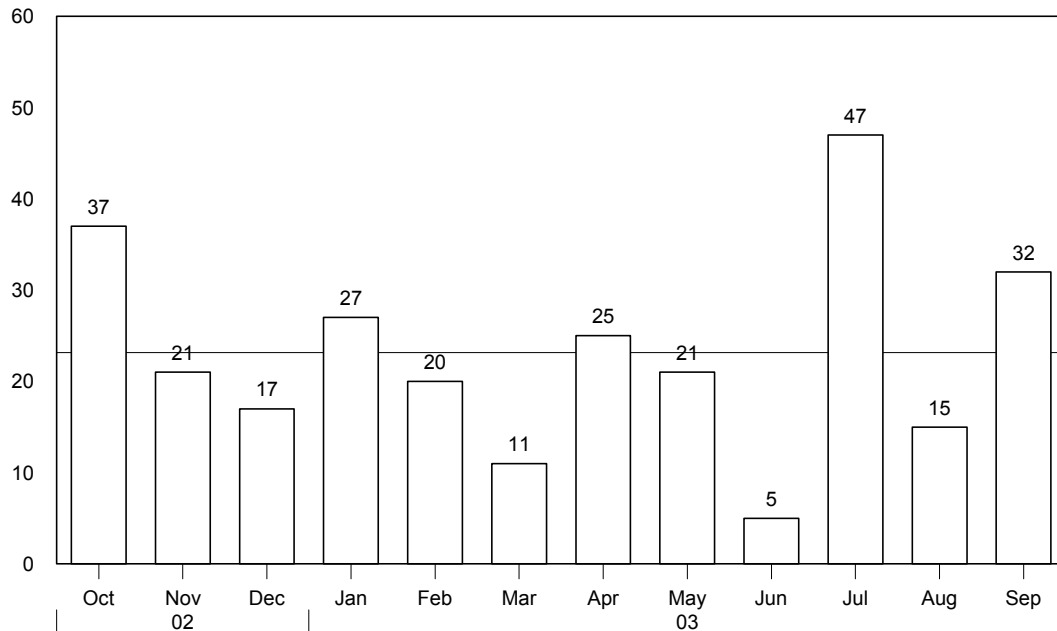
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Mass Standards Testing Results

	<u>Approved</u>	<u>Adjusted</u>	<u>Condemned</u>
October	650	45	0
November	489	23	3
December	701	35	0
January	497	29	2
February	574	14	2
March	1,033	98	2
April	1,111	74	22
May	1,197	84	3
June	744	35	13
July	955	56	2
August	684	72	3
September	1,088	70	0
TOTAL	9,723	635	52

Volumetric standards are provers used in the testing of liquid measuring devices such as gas pumps, fuel oil and liquid petroleum gas (LPG) measuring meters.

Volumetric Standards Tested by Month



Volumetric Standards Testing Results

	<u>Approved</u>	<u>Adjusted</u>	<u>Condemned</u>
October	37	10	0
November	21	8	0
December	17	4	0
January	27	22	0
February	20	17	0
March	11	8	0
April	25	21	0
May	21	12	0
June	5	3	0
July	47	14	0
August	15	10	0
September	32	23	0
TOTAL	278	152	0

Additionally, laboratory staff tested one linear measure and 633 wheel load weighers used in primary and secondary road load enforcement for local jurisdictions.

WEIGHTS AND MEASURES PROGRAM

During FY 2003, the Weights and Measures Program began to administer technical tests and issue registration certificates to both service agencies and servicepersons as part of the Voluntary Service Registration Program. Senior Weights and Measures Inspectors, working closely with members of industry, conducted training reviews prior to the administration of 13 separate technical code exams. Testing of Servicepersons helps ensure the proper installation, maintenance and repair of all commercial weighing and measuring devices. Service agencies are also required to obtain and utilize field standards that have been tested and certified by a National Institute of Standards and Technology (NIST) traceable metrology laboratory. The vast majority of these standards are verified in the Michigan Department of Agriculture's (MDA) state-of-the-art E.C. Heffron Metrology Laboratory located in Williamston, Michigan.

Both the service industry and their industry customers that utilize commercial devices to conduct business support the Voluntary Registration Program. Senior staff have provided numerous technical presentations and submitted informational articles to organizations such as the Associated Food Dealers of Michigan and the Michigan Propane Gas Association. To date, 84 service agencies have been registered, along with 186 Servicepersons. Registrants include those based in Michigan, Ohio, Wisconsin and Indiana.

Consumer complaints, commercial device rejection rates, and enforcement actions remained at high levels in FY 2003. Over 860 consumer and/or industry complaints alleging short measure and short weight were investigated during FY 2003. Enforcement actions included 199 Warning Letters, 26 Administrative Fines, and one criminal prosecution. Violations were cited for intentional fraud and negligent criminal activities, and resulted in fines in excess of \$120,000. Parties cited included an out-of-state manufacturer who grossly misrepresented its products to a Michigan distributor and its customers and a door-to-door frozen meat sales operation found guilty of shorting its customers. These penalties represent the most severe violators, as the primary tool used by the Weights and Measures Program is compliance assistance and the open distribution of technical information.

MDA's Weights and Measures Program is the sole state agency responsible for ensuring that all commercial weighing and measuring devices are correct and not subject to fraudulent operation and that all commercial transactions involving commodities bought or sold on the basis of weight, measure, or count are done so properly. This directly supports Michigan's economic core, ensuring that Michigan's 10 million citizens and thousands of businesses get what they pay for so they can conduct commerce in a fair and equitable marketplace.

GENERAL WEIGHTS AND MEASURES INFORMATION AND STATISTICS

* * * * *

Weights and Measures Undercover Activities

Consumer Protection Section employees are equipped with unmarked vehicles holding calibrated false tanks which they use to conduct unannounced dispenser accuracy checks. Following are the results of these unannounced purchases during FY 2003:

Number of Purchases	1,814
Number of Shortages $\geq 1.0\%$	48
Percentage of Purchases $\geq 1.0\%$ Short Measure	2.65

Registered Serviceperson Activities

Agencies Registered	84
Technicians Registered	186
Service Tests Administered	1,128
Internal Audits Conducted	697
Field Audits Conducted	165
Audit Compliance Rate	84.6%

Weights and Measures Complaints Investigated

Item Pricing and Accuracy	167
Retail Motor Fuels Dispensers	641
Short Weight/Measure	36
All Other Complaints	17
TOTAL	861

Disposition of P.A. 283 Violations

Compliance Meetings	7
Warning Letters	199
Consent Agreements	26
Prosecutions	1
Seizures	29
Fine Amounts	\$123,985

STATE OFFICIALS' INSPECTIONS

Establishments Visited by Type

Food Processing Plants	38
Gasoline Stations	1,378
Grain Elevators	104
Grocery Stores (large and small)	304
Hardware Stores	8
Livestock Scales	4
Manufacturing Plants (non-food)	46
Petroleum Products Distributors	135
Produce Markets	2
Scrap Metal Dealers	76
All Other Establishments	458
TOTAL	2,553

These establishments were visited by inspectors to inspect weighing and measuring devices and verify the net content of packaged commodities.

Net Content Inspections

Field	<u>Surveys</u>	<u>Packages Approved</u>	<u>Packages Rejected</u>	<u>Compliant (%)</u>	<u>Lots Approved</u>	<u>Lots Rejected</u>	<u>Compliant (%)</u>
	307	2,364	282	89.34	53	99	34.87

Devices Inspected

<u>Commercial Device Type</u>	<u>Approved</u>	<u>Condemned for Repair</u>	<u>Condemned for Use</u>	<u>Compliant (%)</u>
Animal/Livestock Scale	4	0	0	100.00
CNG Meter	2	0	0	100.00
Counter Scale	1,909	50	19	96.51
Crane Scale	3	0	0	100.00
Fuel Truck Meter	114	17	8	82.01
Gasoline Blend Meter	1,708	462	87	75.68
Gasoline Meter	4,013	610	291	81.66
Hopper Scale	8	0	0	100.00
LPG Meter (25 GPM or less)	29	2	2	87.88
LPG Meter (over 25 GPM)	100	12	1	88.50
Person Weighing Scale	3	0	0	100.00
Platform Scale (1,500 lbs or less)	231	3	4	97.06
Platform Scale (over 1,500 lbs)	48	10	5	76.19
Single Product Meter (over 25 GPM)	197	47	8	78.17
Terminal Meter	46	15	2	73.02
Track Scale	4	0	0	100.00
Vehicle Scale (2 section)	49	5	4	84.48
Vehicle Scale (4+ section)	419	77	62	75.09
TOTAL	8,887	1,310	496	83.11
<u>Miscellaneous Devices/Standards</u>	<u>Approved</u>	<u>Condemned for Repair</u>	<u>Condemned for Use</u>	<u>Compliant (%)</u>
Weights (Field Tested)	363	0	0	100.00

DETROIT OFFICIALS' INSPECTIONS***Devices Inspected**

	<u>Inspected</u>	<u>Approved</u>	<u>Rejected</u>	<u>Compliant (%)</u>	<u>Re-Inspected**</u>
Taximeter	995	988	7	99.30	76

*The City of Detroit is the only remaining non-state jurisdiction in Michigan.

**All re-inspected devices met standards and were approved.

MOTOR FUELS QUALITY PROGRAM

Michigan's 4.7 billion-gallon demand and consumption of gasoline is one of the highest in the nation. This demand fuels tight competition among marketers with some firms opting to cut corners and neglect good business practices to offset economic hardships. While the main focus of the Motor Fuels Quality program is to protect consumers from economic harm, the program has an added benefit of protecting business from unfair, unscrupulous competition. This tight market competition, coupled with economically tight times, has lead to increased quality problems in the marketplace. The previous year's 3% gain in quality compliance was almost wiped out in FY 2003 with 12% of all gasoline tested failing to meet the state-established standards.

FY 2003 enforcement efforts continued to remain elevated to combat poor compliance with 75 firms fined, 62 stop sales issued, and 726 firms warned to meet compliance standards or face penalties. Despite the continued increase in enforcement efforts, consumers still experienced problems with gasoline marketers. Consumer complaints increased by 19% over the previous year with 1,041 calls received on the Motor Fuels Quality hotline.

To provide an extra measure of gasoline performance assurance to consumers and help keep the market-place competition even, the Motor Fuels Quality program updated Michigan's fuel quality standards in FY 2003. These revised standards are standards agreed upon by automobile manufacturers, gasoline suppliers, and regulators and they are specific to Michigan's climate and seasonal changes.

GENERAL MOTOR FUELS QUALITY INFORMATION AND STATISTICS

Establishments Licensed

Gasoline Retail Outlets	5,176
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Disposition of P.A. 44 Violations

Compliance Meetings	4
Warning Letters	726
Administrative Fines	75
Prosecutions	0
Stop Sales	62
Fine Amounts	\$33,865

Stop Sale Information

<u>Reason</u>	<u>Stop Sales</u>
Excess Water in Underground Storage Tank	40
Failure to Meet Quality Standards	22
TOTAL	62

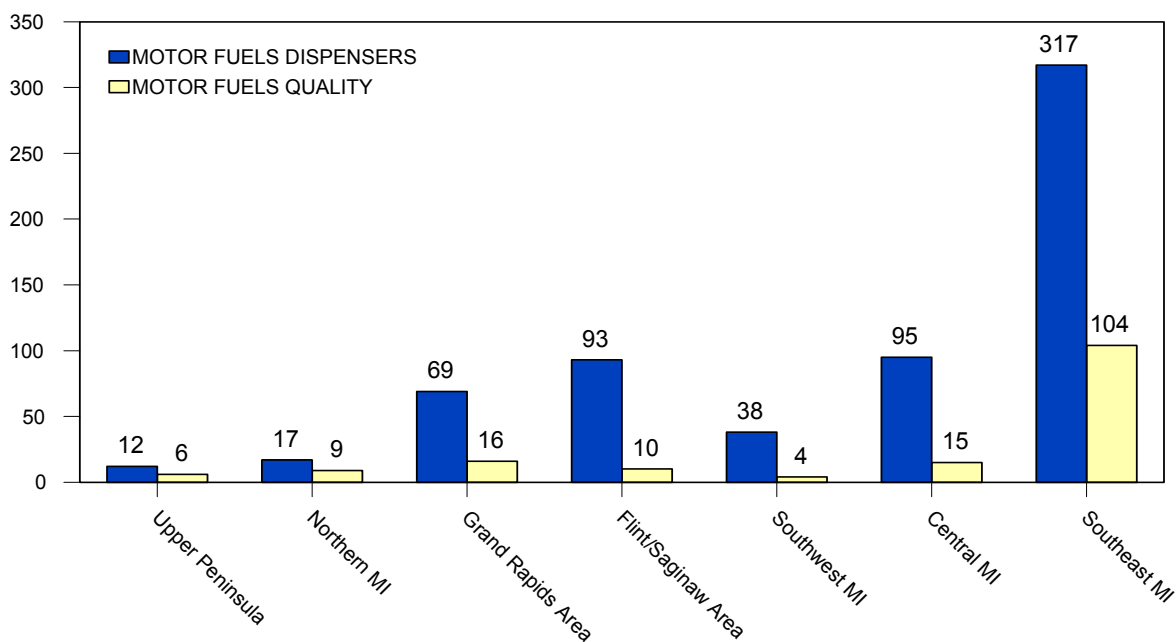
Complaint and Motor Fuels Quality Hotline Information

Complaints Received through 1-800-MDA-FUEL	1,041 *
Gasoline Quality Complaints Investigated	164

*Note: Complaints outside of the program's responsibility, received via the MFQ Hotline, were forwarded to the appropriate agency. All gasoline quality complaints were investigated.

PROGRAM ACTIVITIES

Complaints Investigated by Region



In addition to licensing and inspecting all retail outlets and responding to complaints, Motor Fuels Quality Program staff regularly procures samples and audits gasoline quality with a portable Zeltex octane analyzer. Following are the results for FY 2003:

Samples Procured

<u>Results</u>	<u>Number</u>
Approved	1390
Warning Letters	127
Non-actionable	8
Administrative Fines	43
Investigations In Progress	12
Total	1,580

Zeltex Audits	1,829
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Violation Rate and Breakdown

Samples were procured for the following reasons: a monthly random/stratified program, on-going investigations, consumer complaints, and to assure establishment compliance when there has been a previous violation.

* * * * *

Sample Results by Sampling Method

<u>Sampling Method</u>	<u>Number of Samples</u>	<u>Number of Violations</u>	<u>Compliant (%)</u>
Routine	847	66	92.21
Complaint	160	38	76.25
Re-sample	135	27	80.00
Investigation	31	9	70.97
Confidential/Undercover	172	16	90.70
Other	235	34	85.53
TOTAL	1,580	190	87.97

* * * * *

Sample Results by Octane ((R+M)/2)

<u>Octane (AKI)</u>	<u>Number of Samples</u>	<u>Number of Violations</u>	<u>Compliant (%)</u>
86	23	6	73.91
87	617	44	92.87
88	1	0	100.00
89	361	35	90.30
90	1	0	100.00
91	11	4	63.64
92	156	32	79.49
93	350	41	88.29
94	59	28	52.54
Other	1	0	100.00
TOTAL	1,580	190	87.97

* * * * *

Sample Results by Region

<u>Region</u>	<u>Number of Samples</u>	<u>Number of Violations</u>	<u>Compliant (%)</u>
Upper Peninsula	184	28	84.78
Northern Michigan	89	12	86.52
Grand Rapids Area	201	19	90.55
Flint/Saginaw Area	220	31	85.91
Southwest Michigan	82	5	93.90
Central Michigan	212	20	90.57
Southeast Michigan	592	75	87.33
TOTAL	1,580	190	87.97

VAPOR RECOVERY AND REDUCTION PROGRAM

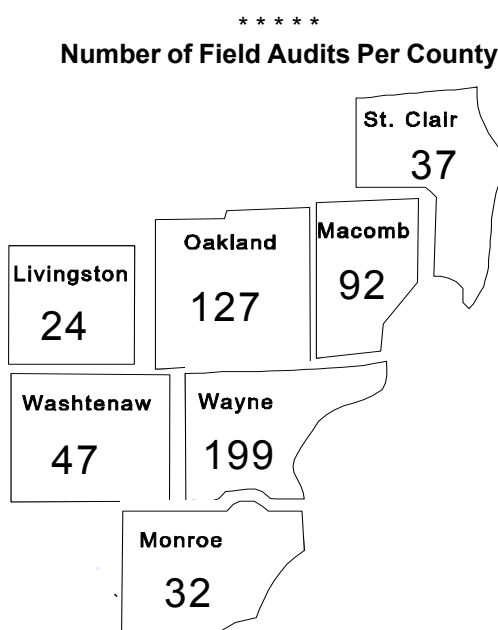
The Motor Fuels Quality Act, P.A. 44 of 1984, as amended requires that Wayne, Oakland, Macomb, Washtenaw, Livingston, Monroe, and St. Clair counties use lower evaporating gasoline (7.8 pounds per square inch vapor pressure or less) from June 1 to September 15 of each year. This program is part of the State Implementation Plan (SIP) submitted to the United States Environmental Protection Agency in 1996 in response to the clean air act mandates.

Just after 4:00 pm ET on Thursday, August 14, power went out in the Northeast and Midwest portions of the country, as well as, parts of Canada. This power blackout caused three refineries that supply gasoline to southeast Michigan to shut down with the Michigan refinery unable to operate until August 24 due to damage sustained during the power outage. The available supplies of 7.8 gasoline were quickly depleted as consumers began panic buying.

On August 15 Governor Jennifer Granholm declared a state of emergency and issued an Executive Order to suspend the 7.8 vapor pressure program to ensure stations in southeast Michigan could receive any available gasoline. The Michigan Department of Agriculture worked with the Michigan Department of Environmental Quality and the Michigan Consumer and Industry Services to request that the United States Environmental Protection Agency (EPA) allow the state to exercise enforcement discretion in regards to the SIP 7.8 Reid Vapor Pressure (RVP) requirements.

On August 16 power was restored to much of southeast Michigan and consumer gasoline buying habits returned to normal; however, inventories of 7.8 gasoline were extremely low with insufficient supplies available to sustain the marketplace through the end of the control period. On August 21, 2003, Governor Granholm lifted the state of emergency and issued an energy emergency to allow the continued suspension of the 7.8 gasoline throughout the control period. US EPA granted enforcement discretion for distribution, transportation, and sales until September 15 provided regulated parties take all reasonable steps to produce and supply 7.8 gasoline to SE Michigan.

Enforcement of the 7.8 rules was suspended from August 14 to September 15; however, the vapor pressure of conventional gasoline remained at 9.0 psi and marketers were still obligated to supply 7.8 RVP gasoline where it was available. The Motor Fuels Quality Staff continued to monitor and test the vapor pressure of gasoline in southeast Michigan throughout the remainder of the control period.



* * * * *

Field Audit and Sample Results

	<u>Field Audits*</u>	<u>Official Samples</u>	<u>TOTAL</u>
Number of Establishments	517	206	677
Number Conducted**	558	241	799
Number of Establishments in Violation	5	5	7
Establishment Violation Rate (%)	0.97	2.43	1.03

* Multiple field audits were conducted, and multiple samples were collected at some establishments, due to violations.

** Effective August 14, 2003, Governor Granholm waived the lower RVP requirement in conjunction with a State of Emergency declaration caused by a major power outage.

* * * * *

Field Audits without Ethanol (7.8 psi RVP limit)

<u>Octane</u>	<u>RVP Average</u>	<u>Number of Field Audits</u>	<u>Number of Violations</u>
86	7.50	1	0
87	7.51	328	4
88	-	-	-
89	7.60	39	2
90	-	-	-
91	-	-	-
92	7.52	7	0
93	7.74	42	4
94	7.38	1	0
TOTAL	7.54	418	10

* * * * *

Field Audits with Ethanol (8.8 psi RVP limit)

<u>Octane</u>	<u>RVP Average</u>	<u>Number of Field Audits</u>	<u>Number of Violations</u>
86	8.87	17	0
87	8.74	92	2
88	-	-	-
89	8.72	14	0
90	-	-	-
91	8.56	1	0
92	8.78	8	0
93	11.08	2	1
94	8.66	6	0
TOTAL	8.79	140	3



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